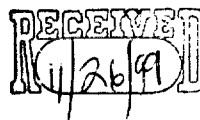




KLEOS LABORATORIES™

November 15, 1999

Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C St. SW
Washington, DC 20204



Re: Notification of Statement for a Dietary Supplement

Dear Sir or Madam:

Pursuant to §403(r)(6) of the Federal Food, Drug and Cosmetic Act, 21 U.S.C. §343(r)(6), and 21 CFR §101.93, the undersigned submits the following on behalf of Kleos Laboratories Inc.
350 South 400 East Suite 206
Salt Lake City UT 84111

Statements: Biphasx is the ideal tool for successful weight management because the formulations support both physiological and psychological needs. Biphasx helps to increase your metabolism by provoking the liberation and burning of stored fat (thermogenesis) while preventing the loss of lean muscle tissue (anti-catabolism). This should provide you with a deeper supply of energy, and the ability to utilize that energy more efficiently. Biphasx targets the emotional lows that accompany dieting by supplying vital precursors to brain neurotransmitters. These mood regulators will help you maintain a positive attitude—they also help you better control your dietary behavior by suppressing your appetite for the foods you don't need.

Chromium Picolinate	Supports the body's metabolism of carbohydrates, fats, and proteins
Hydroxycitric Acid	Helps to manage appetite, reduces carbohydrate cravings, and inhibits an enzyme responsible for the conversion of carbohydrates into fat
L-Carnitine	Plays a key role in fat metabolism and energy production
L-Tyrosine	Involved in the synthesis of 90% of your brain neurotransmitters, some of which help regulate mood and control appetite
HMB	Helps the body maintain muscle tissue during restricted caloric consumption
Guarana (Natural source of caffeine)	Helps liberate fatty acids from body-fat stores
Ma Huang (Natural source of ephedrine)	Helps the body metabolize excess calories and fat deposits
Ginger	Supports the digestive system
Ginko Biloba	Supports the circulatory system by increasing oxygenation and blood flow
Kelp	Helps maintain normal metabolism in all cells of the body
5-HTP	Helps maintain emotional balance, and manage appetite
Cayenne	Supports the digestive system
Gymnema Sylvestre	Helps reduce sugar cravings ("Gurmar" another constituent of the leaves, is known as the "sugar destroyer")
Mustard Seed	Bolsters thermogenesis

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KLEOS LABORATORIES™

Acetyl-L-Carnitine	Helps the body maintain muscle mass during restricted caloric consumption, and improves cognitive function
St. John's Wort	Helps maintain emotional balance, and manage appetite
Advantra-Z™	Stimulates Beta-3 receptors that increase the rate at which fat is released from body-fat stores (lipolysis) and increases fat metabolism
Tinospora Cordifolia	Helps the body reduce excess water retention while sparing potassium
DL-Phenylalanine	Helps brain function and appetite management
Herb Complex	Helps the body reduce excess water retention while sparing potassium
(Couchgrass, Buchu, Uva Ursi, Juniper Berry, Hydrangea Root, Cornsilk)	

The statements contained herein have not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure or prevent any disease.

Name of Dietary Ingredient: Provided
Name of Dietary Supplement: Biphasx

I hereby certify that the information contained in this notification is complete and accurate, and that the above listed firm has substantiation that the statements are truthful and not misleading.

Douglas M. Ostlund, Secretary